IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MARTEN GROUP, INC. d/b/a SENERGY MEDICAL GROUP and SCOTT TENNANT,

Plaintiffs,

v.

JERALD TENNANT, MD, JOHN TENNANT, TERESA JESSEN TENNANT, JARED TENNANT, TENNANT DEVICES AND ACCESSORIES, LLC, and CURADOR, LLC,

Defendants.

Case No. 3:24-cv-01852

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE MEDIATION

Defendants Jerald Tennant, M.D., John Tennant, Teresa Jessen Tennant, Jared Tennant, Tennant Devices and Accessories, LLC, and Curador, LLC (together, "Defendants") and Plaintiffs Marten Group, Inc., d/b/a Senergy Medical Group and Scott Tennant (together, "Plaintiffs"), jointly seek an extension of time to complete mediation and change of the previously identified mediator, Hon. Harlan A. Martin (Former) to Ross Stoddard. In support of this request, the parties show the Court as follows:

1. The Court's scheduling order set the date for completing mediation for January 24, 2025. Dkt. 31.

- 2. On October 24, 2024, the parties submitted their Joint Report naming Hon. Harlan A. Martin (Former) as their mediator. Dkt. 49.
- 3. On October 25, 2024, the Court entered its Mediation Order [Dkt. 50] ordering this case to mediation before Judge Martin by January 24, 2025.
- 4. Although the parties have been actively pursuing discovery, including exchanging initial written discovery requests and scheduling depositions that effort is still in the early stages. Among other things, the parties are currently working to schedule party depositions and conferring on written discovery responses and document production.
- 5. Given the current posture of the case and the ongoing discovery efforts, the parties agree that mediation will be more productive at a later date.
- 6. To ensure that mediation nevertheless occurs in a timely manner, the parties have agreed to attend mediation on March 7, 2025.
- 7. To accommodate this date, the parties have agreed to mediate before Ross Stoddard. Mr. Stoddard has availability to mediate on March 7, 2025, and the parties are coordinating to secure that date.

Therefore, based on the foregoing, the parties respectfully request that this Court extend the deadline to complete mediation to March 7, 2025. The parties also request that the Court allow them to use a different mediator than originally

identified in the scheduling order, and now mediate with Ross Stoddard.

Dated: January 24, 2025 Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on January 24, 2025.

By: <u>/s/Tyler L. Farmer</u>
Tyler L. Farmer

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that the parties have complied with the meet and confer requirements of Local Rule CV-7(h) and that the foregoing motion and relief sought therein is unopposed.

By: <u>/s/Tyler L. Farmer</u> Tyler L. Farmer